

DECISION RECORD
for
Table Rock Wilderness Trail and Trailhead Project

Environmental Assessment (EA) No. OR-080-01-13

August 2001

United States Department of the Interior
Bureau of Land Management, Oregon/Washington
Salem District Office, Cascades Resource Area

Township 7 South, Ranges 3 and 4 East, Willamette Meridian
Clackamas County, Oregon

I. BACKGROUND

A major flood event in 1996 caused road damage that required the closure of road segments accessing two trailheads, one into Table Rock Wilderness and one to Pechuck Lookout (See Project Map). The road segment leading to Table Rock Trailhead was evaluated and found to be too unstable for long-term repairs. As a result, visitors must now traverse along a mile of Table Rock Road to reach the old Table Rock Trailhead. A slide also occurred along Rooster Rock Road restricting vehicle access to the Pechuck Lookout Trailhead requiring visitors to hike over two miles on an existing road to reach the trailhead (See Project Map). These two slides have significantly reduced access to the Table Rock Wilderness. The proposed trail and trailhead improvements are needed to reestablish safe and reasonable access to Table Rock Wilderness and Pechuck Lookout. In addition to safety considerations, work on trailheads and trail access is needed to prevent the establishment of undesignated trails and to provide access that contributes to a positive wilderness experience.

The Table Rock Wilderness Trail and Trailhead Project Environmental Assessment (number OR-080-01-13) analyzed a no action alternative and the proposed action which would entail 3,500 feet of trail construction for the proposed Wapiti Trail and 4,000 feet of trail maintenance and realignment work on an existing "impromptu" trail for the proposed Rooster Rock Trail. The establishment of the Table Rock and Rooster Rock Trailheads are being proposed to replace the two trailheads cut off by road closures, resulting from the 1996 flood damage. Safety improvements related to parking and turn-around areas are also proposed for the existing Bull Creek Trailhead. The trail and trailhead work would help maintain access for recreational opportunities to the wilderness and would help reduce resource damage resulting from the development of undesigned trails established by visitors trying to gain access to the wilderness without hiking a road. The proposed improvement would also contribute towards a more positive wilderness experience. The Environmental Assessment and a Finding of No Significant Impact were issued on July 19th, 2001 and made available to the public for comment until August 10th, 2001.

II. MODIFICATIONS TO THE PROPOSED ACTION/CHANGES TO AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

1. Clarification of the Proposed Action

- a. Pechuck Lookout Signs:** Signs to Pechuck Lookout along the proposed Rooster Rock Trail were not specifically addressed in the proposed action. This section clarifies that installing signs indicating the route to Pechuck Lookout is not part of the proposed action. No new signs related to Pechuck Lookout would be installed within the wilderness. However, trailhead maps and the Table Rock Wilderness brochure currently show the location of the lookout and would continue to do so.
- b. Old Table Rock Trail:** The status of the old trail leading to Table Rock from the Old Table Rock Trailhead was not specifically addressed in the proposed action. This section clarifies that the trail would continue to be maintained and would not be abandoned. The trail has unique geological and other features which are still of interest to visitors to the wilderness. In addition, trail improvements from the end of the Wapiti Trail to the top of Table Rock or from Table Rock to Rooster Rock are not part of the proposed action and would not occur as a result of implementing this decision.

2. Addition of Alternatives Considered but not Analyzed

- a. Image Creek Trailhead:** Establishing a secondary trailhead and a trail that would extend from Table Rock Road along Image Creek into the wilderness to connect up to the existing trail system was considered. While this trail would be shorter, it would be located near a stream within a Riparian Reserve, making it ill-suited for concentrated hiking or equestrian use. As a result, the trailhead and trail were not included in the proposed action.

3. Additional Analysis of Environmental Consequences

- a. Recreation/Wilderness/Visual Resources:** Concerns were raised in public comments on the Environmental Assessment about the potential increases in both hiking and equestrian use of the wilderness as a result of constructing the Wapiti Trail (See Appendix A). Equestrian use to Table Rock is expected to remain relatively low. No trail improvements from the end of the Wapiti Trail to the top of Table Rock, or from Table Rock to Rooster Rock are planned. These trails are narrow and rocky in many locations, and generally would not be considered a highly desirable ride that would attract significant increases in equestrian use. In addition, the proposed improvements to the Bull Creek Trailhead may help attract equestrian users from the Table Rock Trailhead to the southern portion of the wilderness.

For hikers, the Wapiti Trail would provide a challenging and rigorous hike, similar to the hike from the old Table Rock Trailhead. While use declined directly after the slide, it has been returning to pre-slide levels. The construction of the Wapiti Trail

may slightly increase use in the short-term, but is not expected to be significantly higher than would have occurred had access not been blocked to the old Table Rock Trailhead. BLM staff and volunteers would continue to monitor conditions within the wilderness and the new proposed trailheads would provide greater opportunities to provide information on “Leave No Trace” use ethics.

Similar concerns related use increases and potential vandalism were also identified for the improvements to the proposed Rooster Rock Trailhead and Trail. The proposed Rooster Rock Trail would require a challenging and rigorous hike over a mile and a half in length to reach Pechuck Lookout. Past experience within the Molalla Recreation Corridor and other areas has indicated that blocking motorized access even as little as a quarter of a mile from a sensitive area significantly reduces problems with litter and vandalism. Vandalism is always a concern and could occur even under the existing access situation. While the existing route is longer, it is easier, given that it follows an old road bed. It is not expected that the Rooster Rock Trail would significantly increase the potential of vandalism to a higher degree than that which already exists.

III. ALTERNATIVES CONSIDERED

The alternatives considered in detail included the required “no action” alternative, and the proposed action alternative which initiated the environmental analysis process. The Environmental Assessment contains a description of the alternatives (pages 3-6) and the analysis of the effects of the alternatives (pages 10-13).

IV. DECISION

The Decision to be made by the Cascades Resource Area Manager is whether or not to prepare an environmental impact statement, and whether to approve the Table Rock Wilderness Trailhead and Trail Projects as proposed, not at all, or to some other extent.

Based on the analysis contained in the Table Rock Wilderness Trail and Trailhead Project Environmental Assessment, the supplemental analysis provided above, and management direction contained in the *Salem District Resource Management Plan*, May 1995 and the *Table Rock Wilderness Management Plan*, February 1987, I have decided to implement the Table Rock Wilderness Trail and Trailhead Projects as described in the environmental assessment as Alternative A: Proposed Action along with the modifications described in Section II of this document.

Rationale for Decision: The proposed trailhead and trail improvements would reestablish the access needed to offer a quality wilderness experience similar to that offered by the area, prior to the access loss that occurred as a result of flood damage in 1996. In addition, the proposed trailhead improvements would also provide more defined and safer parking areas.

V. PUBLIC INVOLVEMENT

The proposed trail and trailhead improvements were published in the Salem District Project Update Report in September and December of 2000 and in March of 2001. No comments or concerns related to the proposed project were received during the scoping period.

A legal notice announcing the availability of the *Table Rock Wilderness Trail and Trailhead Project Environmental Assessment* and *Finding of No Significant Impact* documents were published on July 20th, 2001 in the *Oregonian*, and July 21, 2001 in the *Molalla Pioneer*. The Environmental Assessment and Finding of No Significant Impact were published on the Salem Districts Website and hard copies were sent to 39 individuals and groups including local and national congressional representatives, local community leaders, and recreational and wilderness groups. A public comment period was held between July 20th and August 10th. Three letters and one phone call were received and are summarized and addressed in Appendix A of this document.

VI. CONCLUSION

I have determined that change to the Finding of No Significant for the Table Rock Wilderness Trail and Trailhead Project Environmental Assessment is not necessary because the existing environmental assessment, along with the additional information contained in this document do not exceed the impacts described in the *Salem District Resource Management Plan*, May 1995 or the *Table Rock Wilderness Management Plan*, February 1987, or the “Ten Significance Criteria” described in page 2 of the *Table Rock Wilderness Trail and Trailhead Project Finding of No Significant Impact* statement.

VII. IMPLEMENTATION

This decision will be sent to the same individuals and group listed for the Environmental Assessment as well as any individuals who provided comments. Implementation of this decision may begin 30 calendar days after the public notice of the Decision Record appears in the *Oregonian* newspaper on August 20th, 2001.

VIII. RIGHT TO APPEAL

This decision may be appealed to the Interior Board of Land Appeals (Board), Office of the Secretary, in accordance with the regulations contained in 43 Code of Federal Regulations (CFR), Part 4 and the enclosed Form 1842-1. If an appeal is taken, your notice of appeal must be filed in this office within 30 days from receipt of this decision. The appellant has the burden of showing that the decision appealed from is in error.

If you wish to file a petition pursuant to regulation 43 CFR 4.21 (58 FR 4939, January 19, 1993)

If you wish to file a petition pursuant to regulation 43 CFR 4.21 (58 FR 4939, January 19, 1993) or 43 CFR 2804.1 for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal. A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of the notice of appeal and petition for a stay must also be submitted to each party named in this decision and to the Board and to the appropriate Office of the Solicitor (see 43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Standards for Obtaining a Stay

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards:

- (1) The relative harm to the parties if the stay is granted or denied,
- (2) The likelihood of the appellant's success on the merits,
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.

CONTACT PERSON

For additional information concerning this decision, contact Laura Graves, Salem District Office, 1717 Fabry Road SE Salem, OR 97306; telephone (503)315-5908.

Approved by: Richard C. Prather 16 AUG 2001
Richard C. Prather Date
Cascades Field Manager

Appendix A: Response to Public Comments

Three letters and one phone call were received during the comment period for the Table Rock Trail and

Trailhead Project Environmental Assessment and Finding of No Significant Impact. One of the letters and the phone call were supportive of the proposed action and two of the letters voiced concerns about portions of the proposed action. Below is a summary of the concerns and responses to those concerns.

1. Concerns about the proposed Wapiti Trail:

Comment A from Letter 2: *"I would like to address the proposed Wapiti Trail - I don't think you realize how much use this area gets in the winter. Most of my visits to the area are in the late fall, winter and spring. I am off to higher places in the summer. In the afternoon, on a sunny winter day, a lot of visitors are at Table Rock. We have seen families with small children and babies- all for the most part ill prepared for cold conditions. At least most of them stop at the edge of the boulder field. I would recommend improving the access to the Old Jeep Road where it comes close to the road, either at my dear trail or at Image Creek. . . .Another concern is that if you improve the conditions of horse access to Table Rock, it may get them to the base of the rock more safely. Then what? Will they ride to the top? Will they use the saddle trail with the rock chute hazard on the Rooster Rock side?"*

Comment B from Letter 3: *"I believe the additional miles of road walking has contributed to an improvement of the natural conditions on the summit. When I first visited the summit in the late 80's there was usually trash, fire rings, abuse obtaining firewood etc. It has recovered nicely since. I would improve the parking, make a quality trail around the slide, improve the rock field. I would support a short link to the north side of the jeep road where it comes nearest to the access road (near Image Creek)."*

Response: The BLM encourages people to be well prepared in the information it provides about Table Rock Wilderness. If people arrive ill prepared for hiking in the Table Rock Wilderness, the proposed Image Creek Trail and Trailhead would be a much longer hike than the proposed Wapiti Trail, offering greater potential for encountering problems with unexpected weather changes. In addition, any concerns about hiking to the top of Table Rock would still exist. While risk is part of the wilderness experience, the construction of the Wapiti Trail would not increase the risk to hikers over that which existed under the Table Rock Wilderness Management Plan and the Table Rock Trail, prior to the loss of access to the Old Table Rock Trailhead and Trail in the flood of 1996.

Equestrian use to Table Rock is expected to remain relatively low. No trail improvements from the end of the Wapiti Trail to the top of Table Rock, or from Table Rock to Rooster Rock are part of the proposed action and would not occur as a result of implementing the proposed projects. These trails are narrow and rocky in many locations, and generally would not be considered a highly desirable ride that would attract significant increases in equestrian use. In addition, the proposed improvements to the Bull Creek Trailhead may help attract equestrian users from the Table Rock Trailhead to the southern portion of the

wilderness.

Adding the Image Creek Trail and Trailhead would simply provide increased access to the wilderness, while most visitors would still continue to use the informal trailhead near the slide to access the wilderness. In addition, the Image Creek Trail would have been located along a stream within a riparian reserve, making it ill-suited for concentrated hiking or equestrian use. There is also a concern that over time, “improptu” trails would develop either near the proposed Wapiti Trail or in other locations along Table Rock Access Road. BLM staff and volunteers would continue to monitor conditions within the wilderness and the new proposed trailheads would provide greater opportunities to provide information on “Leave No Trace” use ethics.

2. Concerns about the Rooster Rock Trail and Trailhead:

Comment C from Letter 2: *“Regarding the Rooster Rock/Pechuck trailhead improvements: We have had a concern regarding making public access to the lookout too easy. We fear that it could turn into a “party” site destination like Bagby Hot Springs. I would put the Pechuck Trailhead project at the bottom of the list, unless it would mean at least an hour and a half (one way) into the lookout. The connector trail could be signed to Rooster Rock with no reference to the lookout.”*

Response: The proposed Rooster Rock Trail would require a challenging and rigorous hike over a mile and a half in length to reach Pechuck Lookout. Past experience within the Molalla Recreation Corridor and other areas has indicated that blocking motorized access even as little as a quarter of a mile from a sensitive area significantly reduces problems with litter and vandalism. Vandalism is always a concern and could occur even under the existing access situation. While the existing route is longer, it is easier, given that it follows an old road bed. It is not expected that the Rooster Rock Trail would significantly increase the potential of vandalism to a higher degree than that which already exists. No new signs related to Pechuck Lookout would be installed within the wilderness as part of the proposed action. However, the trailhead maps and the Table Rock Wilderness brochure currently show the location of the lookout and will continue to do so.

3. Concerns about the use of contractors for completing project work:

Comment D from Letter 2: *“The other concern I have heard expressed about the project is if the BLM is hiring a contractor to do the improvements. I can see that the parking area would need heavy equipment to do the job. I would like to pass on to you the suggestion that volunteers to do the trail improvements, rather than a contractor.”*

Response: Implementation of the proposed projects in the Table Rock Wilderness would be completed with combination of contractor, staff, and volunteer work. The funding being used for contracting work is part of a federal “Jobs in the Woods” program. This program requires that any work done be completed under contract. The BLM would not be able to use these funds to assist in the implementation of some the projects if the work were done by BLM staff or volunteers. Contracting out part the projects provides access to funding that would not otherwise be available.

